REMARKS

Claims 1-2, 6-9, 11-13 and 18 are pending in the present application. The Office Action and cited references have been considered. Favorable reconsideration is respectfully requested.

Claims 1, 12, 13, and 18 were rejected under 35 U.S.C. § 112, second paragraph. Claim 18 has been cancelled. Amendments have been made in claims 1, 12 and 13 to address each of the concerns raised in the Office Action. If any concerns remain, the Examiner is requested to contact the undersigned to advance prosecution.

Claims 1, 2 , 6, 7 and 18 are rejected under 35 U.S.C. §102(b) as being anticipated by Conley (U.S. Patent Application Publication No. 2002/0099904). Claims 8-9 and 12-13 were rejected under 35 U.S.C. §103(a) as being unpatentable over Conley in view of Estakhri et al. (U.S. Patent No. 5,930,815). Claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Conley in view of Asnaashari (U.S. Patent No. 5,928,370). These rejections are respectfully traversed for the following reasons.

Claim 1 recites a method for writing memory sectors in individually-deletable memory blocks (SB), comprising a number of physical memory sectors, whereby access to the physical memory sectors is achieved by means of an allocation table (ZT) for address conversion of a logical address (LA) into a physical block address (RBA) and a physical sector address (RSA). The method comprises writing sectors to an alternative memory block (AB) by means of an altered address conversion for the corresponding physical block address (RBA) when a sector write command is to be

carried out to an already written sector, wherein the step of writing sectors is carried out one by one to adjacent sector positions of the alternative memory block (AB), storing the sector positions of the written sectors in the alternative block (AB) into a sector table, which is organized as a search table (ST), where each table entry indicates a physical sector address (RSA) of a written sector with a corresponding valid sector position in the alternative block (AB), and using the physical sector address (RSA) for searching the sector table to find positions of valid sectors in the alternative block (AB). This is not taught, disclosed or made obvious by the prior art of record.

Applicant respectfully submits that Conley does not teach the method of the present application.   Claim 1 now describes more precisely that only the physical block address (PBA) is altered, when the address translation to the alternative block is done "writing sectors to an alternative memory block (AB) *by means of an altered address conversion for the corresponding physical block address (RBA)* when a sector write command is to be carried out to an already written sector." The physical sector address (RSA) is used for searching in the sector table to find the position of the valid sector in the alternate block (AB), if the sector was modified.

The sector table as a search table contains only entries for the physical sector addresses and the corresponding positions of modified sectors in the alternate block, which relates to the addressed physical block. The sector table can be short, as it is related only to modified sectors. In the present application, the address translation table for the block addresses and the sector table for the valid sectors in the alternate blocks are different tables.

In contrast, Conley teaches address conversion for the whole address, comprising the physical block number PBN and the Page. The conversion table includes, in addition to the logical and the physical addresses, the entries for modified pages. For each modifying of a page, a new entry in the table (Fig. 12) is added. As the table is organized sequentially for each logical address, it is an index table, and the page is found directly by its logical address. A search for modified pages is not necessary, but the table is very large and needs a lot of memory in the controller.

If only a few pages are modified, a conversion table, containing only the logical and physical block addresses and a small separate sector table, containing only the positions of the modified sectors, are advantageous, as it is used in the present application. This advantage is not available using the techniques taught by Conley. For at least these reasons, Applicant respectfully submits that claim 1 is patentable over the prior art of record.

Claims 2 -17 depend from an included recitation of claim 1. Applicant respectfully submits these claims are patentable of and of themselves, and at least for the reasons discussed above with respect to claim 1. Claim 18 is believed to be patentable at least for the reasons discussed above with respect to claim 1.

In view of the above amendments and remarks, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections of record. Applicant submits that the application is in condition for allowance and early notice to this effect is most earnestly solicited.

       If the Examiner has any questions, he is invited to contact the undersigned

at 202-628-5197.

                              Respectfully submitted,

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